

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ) CRIMINAL NO.: 04-10146-WGY  
 )  
 v. ) VIOLATIONS:  
 )  
 ) 18 U.S.C. § 1958 - Use of  
 ROBERT RAMOS ) Interstate Commerce Facilities  
 ) In The Commission of Murder-  
 ) For-Hire  
 ) 18 U.S.C. § 1958 - Interstate  
 ) Travel In The Commission Of  
 ) Murder-For-Hire  
 ) 18 U.S.C. § 2 - Aiding and  
 ) Abetting

**SUPERSEDING INFORMATION**

COUNT ONE: (Title 18, United States Code, Section 1958 - Use  
of Interstate Commerce Facilities In The  
Commission of Murder-For-Hire)

The United States Attorney charges that:

Between on or about September 24, 2003, and December 9,  
2003, in the District of Massachusetts and elsewhere,

ROBERT RAMOS

defendant herein, with intent that the murder of the mother of  
his child be committed in violation of the laws of the  
Commonwealth of Massachusetts, did knowingly and intentionally  
use and cause to be used facilities in interstate commerce, that  
is, telephone and cellular phones, to further plans to murder an  
individual, to wit, the mother of his child, as consideration for  
a promise and agreement to pay things of pecuniary value, that  
is, money paid and to be paid to an individual to commit murder.

All in violation of Title 18, United States Code, Sections  
1958 and 2.

COUNT TWO: (Title 18, United States Code, Section 1958 -  
Interstate Travel In The Commission Of Murder-For-  
Hire)

The United States Attorney further charges that:

On or about October 20, 2003, in the District of  
Massachusetts and the District of Rhode Island

ROBERT RAMOS

defendant herein, with intent that the murder of the mother of  
his child be committed in violation of the laws of the  
Commonwealth of Massachusetts, traveled in interstate commerce  
from the Commonwealth of Massachusetts to the State of Rhode  
Island to discuss plans to murder an individual, to wit, the  
mother of his child, as consideration for a promise and agreement  
to pay things of pecuniary value, that is, money paid and to be  
paid to an individual to commit murder.

All in violation of Title 18, United States Code, Sections  
1958 and 2.

COUNT THREE: (Title 18, United States Code, Section 1958 -  
Interstate Travel In The Commission Of Murder-For-  
Hire)

The United States Attorney further charges that:

On or about December 9, 2003, in the District of  
Massachusetts and the District of Rhode Island

ROBERT RAMOS

defendant herein, with intent that the murder of the mother of  
his child be committed in violation of the laws of the  
Commonwealth of Massachusetts, traveled in interstate commerce  
from the Commonwealth of Massachusetts to the State of Rhode  
Island to discuss plans to murder an individual, to wit, the  
mother of his child, as consideration for a promise and agreement  
to pay things of pecuniary value, that is, money paid and to be  
paid to an individual to commit murder.

All in violation of Title 18, United States Code, Sections  
1958 and 2.

NOTICE OF ADDITIONAL FACTORS

The United States Attorney further alleges that:

1. A two-level upward adjustment is warranted pursuant to U.S.S.G. §3B1.3 because Defendant abused a position of private trust and used a special skill in a manner that significantly facilitated the commission or concealment of the offenses with which he is charged.

MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

By: \_\_\_\_\_

EMELY R. SCHULMAN  
Assistant U.S. Attorney

Date: \_\_\_\_\_